

Ryan, Erin T. (CIV)

From: Ryan, Erin T. (CIV)
Sent: Friday, August 18, 2023 4:18 PM
To: St. John, Joseph; James Percival; Anita Patel
Cc: Ward, Brian C. (CIV); Reuveni, Erez R. (CIV); Fudim, Elissa P. (CIV)
Subject: AO Rule - Deposition Notices
Attachments: 30(b)(6) for LADCFS.pdf; 30(b)(6) for LADOE.pdf; 30(b)(6) for LDH.pdf; 30(b)(6) for LDPSC.pdf; 30(b)(6) for STATE OF LOUISIANA.pdf

Tracking:	Recipient	Delivery	Read
	St. John, Joseph		
	James Percival		
	Anita Patel		
	Ward, Brian C. (CIV)	Delivered: 8/18/2023 4:18 PM	Read: 8/21/2023 2:45 PM
	Reuveni, Erez R. (CIV)	Delivered: 8/18/2023 4:18 PM	Read: 8/18/2023 4:35 PM
	Fudim, Elissa P. (CIV)	Delivered: 8/18/2023 4:18 PM	Read: 8/18/2023 4:19 PM

Hi Scott and Jimmy,

Attached, please find 30(b)(6) deposition notices for the State of Louisiana and some of its agencies. A few notes: as there has been some confusion and disagreement in the past about the relationship between the state and its agencies, we included the same topics from the agency notices in the notice of the state of Louisiana. If the standalone notices for the agency are preferred, we can amend the notice to the state to remove those duplicate topics. We just included them in this format to cover both bases, but are open to discussing which way will be best for you to reach out to the agencies regarding witnesses.

We also include a notice for Louisiana's Department of Public Safety and Corrections to the extent those are injuries you are still planning to rely on to show standing. From some of your previous emails, you seemed to indicate that standing would be based on the Departments of Health, Education, and Children and Families, but the second amended complaint still contains a number of allegations related to public safety and corrections. If Louisiana is withdrawing their reliance on standing based on those injuries, we can withdraw the deposition notice.

We also left the deposition dates blank so we can find mutually agreeable dates that work for all counsel and your witnesses. We understand you will need time to talk with the agencies, determine who they are designating, and then check their schedules before you can agree to specific dates, so we are open to discussing dates once you have done that. However, to facilitate that, we will need to get an extension of the discovery deadline. Please let us know early next week how much time you think you will need to do all that, and a rough estimate of when you think we can schedule the depositions for, so we can determine the length of the extension we need. Off the top of my head, I assume we're talking about at least 2-3 months, but please let us know.

Finally, these notices are currently only for Louisiana. We understand there will be arguments made as to Florida's standing as well, and we are still evaluating whether we need depositions of Florida witnesses as well. We will let you know within the next week or two.

Thanks,

Erin Ryan

Trial Attorney

U.S. Department of Justice – Civil Division

Office of Immigration Litigation – District Courts Section

Post Office Box 868 | Ben Franklin Station | Washington, D.C. 20044

erin.t.ryan@usdoj.gov | C: 202-532-5802